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6 Attorneys for Defendant,
OCMBC, INC. dba
7 LOANSTREAM MORTGAGE

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UNITED STATES DISTRICT COURT

10 CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION

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12 KIMBERLY HUDSON-BRYANT,
13 individually and on behalf of all others
similarly situated,

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Plaintiffs.

v.

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17 OCMBC, INC. dba LOANSTREAM,
18 PREMIER FINANCIAL MARKETING
LLC D/B/A RESMO LENDING, AND
SEAN ROBERTS

Defendants.

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Case No. 8:24-cv-00067-FWS-JDE

JOINT MOTION AND STIPULATION TO CONTINUE CASE DEADLINES

Judge: Hon. Fred W. Slaughter

Magistrate: Hon. John D. Early

Action Filed: January 11, 2024

Trial Date: TBD

1 Pursuant to Local Rule 7-1, and Section VIII of the Court's Civil Standing
2 Order, Plaintiff Kimberly Hudson-Bryant ("Plaintiff") and Defendants OCMBC, Inc.
3 d/b/a LoanStream ("LoanStream") and Sean Roberts ("Roberts") (collectively,
4 "Defendants") (together with Plaintiff, the "Parties") hereby stipulate and agree as
5 follows:

6 WHEREAS, the Court issued a scheduling order under Federal Rule of Civil
7 Procedure 26(f) on October 24, 2024, ("Scheduling Order") (ECF No. 48).

8 WHEREAS, after new parties were added to the action, the Court issued its
9 Order re Joint Motion and Stipulation to Continue Case Deadlines ("Revised
10 Scheduling Order") on April 28, 2025 (ECF No. 50);

11 WHEREAS, due to party health and scheduling issues, the Court issued its
12 modified Order Re Joint Motion and Stipulation to Continue Case Deadlines on June
13 25, 2025 (ECF No. 52);

14 WHEREAS, thereafter, the Court issued another modified Order re Joint
15 Motion and Stipulation to Continue Case Deadlines ("Modified Scheduling Order")
16 on September 25, 2025, which further continued the trial date and related litigation
17 deadlines (ECF No. 55);

18 WHEREAS, since the Court issued the Revised Scheduling Order and
19 Modified Scheduling Order, ongoing health-related scheduling issues involving
20 Plaintiff, Plaintiff's close family members, a key percipient witness, and
21 LoanStream's 30(b)(6) witness prevent the completion of discovery pursuant to the
22 Modified Scheduling Order, which in turn prevents compliance with the class
23 certification and expert discovery deadlines.

24 WHEREAS, when meeting and conferring in good faith, the Parties have
25 agreed to the following deposition schedule:

- 26 • deposition of Plaintiff on February 17, 2026 and
27 • the deposition of LoanStream's 30(b)(6) designee on February 24, 2026.

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1 WHEREAS, the Parties now jointly agree, stipulate, and request that the Court
2 vacate and continue all deadlines in the Modified Scheduling Order by approximately
3 60 days, as proposed below or as otherwise convenient for the Court.

4 WHEREAS, the Parties have exercised due diligence to date and believe good
5 cause exists to modify the Modified Scheduling Order for the reasons outlined herein
6 and in the accompanying declarations of Thomas F. Landers and Andrew R. Perrong,
7 filed concurrently herewith.

8 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE, AGREE and
9 request that the Court extend all future deadlines in this case as follows:

10	Event	Current Deadline	Proposed Deadline
11	Start of Jury Trial	09/15/26	11/16/26
12	Final Pretrial Conference/Hearing on Motions in Limine	08/13/26	10/13/26
13	L/D to File Motion for Class Certification	02/12/16	04/13/26
14	L/D to File Opposition to Class Certification	03/11/26	05/11/26
15	L/D to File Reply to Class Certification	03/25/26	05/26/26
16	Hearing on Motion for Class Certification	04/16/26	06/15/26
17	Non-Expert Discovery Cut-Off	02/05/26	04/06/26
18	Expert Disclosure (Initial)	02/23/26	04/24/26
19	Expert Disclosure (Rebuttal)	03/09/26	05/08/26
20	Expert Discovery Cut-Off	03/12/26	05/11/26
21	Last Date to Hear Motions Objections to Counter	05/14/26	07/13/26
22	Designations/Counter-Counter Deposition Designations	07/23/26	09/2/26
23	L/D to Complete Settlement Conference	06/18/26	08/17/26
24	Trial Filings (First Round)	07/09/26	09/08/26
	Trial Filings (Second Round)	07/16/26	09/14/26

25 IT IS SO STIPULATED.
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28 [Signatures on Following Page]

1 DATED: January 6, 2026

SOLOMON WARD SEIDENWURM &
SMITH, LLP

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8 DATED: January 6, 2026

PARONICH LAW, PC

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By: /s/ Thomas F. Landers

THOMAS F. LANDERS
Attorneys for Defendant,
OCMBC, INC., dba
LOANSTREAM MORTGAGE

8 DATED: January 6, 2026

PARONICH LAW, PC

10 By: /s/ Anthony L. Paronich

ANTHONY L. PARONICH
Attorneys for Plaintiff,
KIMBERLY HUDSON-BRYANT

14 DATED: January 6, 2026

PERRONG LAW LLC

16 By: /s/ Andrew R. Perrong

ANDREW R. PERRONG
Attorneys for Plaintiff,
KIMBERLY HUDSON-BRYANT

20 DATED: January 6, 2026

DEFENDANT PRO SE

22 By: /s/ Sean Roberts

SEAN ROBERTS
Individual Defendant

1 **ATTESTATION OF SIGNATURE**

2 Pursuant to Central District Local Rule 5-4.3.4(a)(2)(i), I hereby certify that the
3 content of this document is acceptable to Mr. Anthony L. Paronich and Mr. Andrew
4 R. Perrong, counsel for Plaintiff, and Mr. Sean Roberts, defendant *pro se* in this
5 action. I further certify that I obtained authorization from Mr. Paronich, Mr. Perrong,
6 and Mr. Roberts prior to affixing their electronic signatures to this document.

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/s/ Thomas F. Landers

9 THOMAS F. LANDERS
10 Attorneys for Defendant,
11 OCMBC, INC. dba
12 LOANSTREAM MORTGAGE

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